

To: Albright, David[Albright.David@epa.gov]
From: Dermer, Michele
Sent: Fri 6/13/2014 8:19:40 PM
Subject: Alon Status
[Alonletters.pdf](#)

Hi David

This is a combination memo to you about the Aquifer Exemption Status at Alon as well as a general information write up. I am ready to discuss what to do next when you are ready. Let me know and I will schedule a time.

Michele

Alon

Activity Timeline

EPA

Sept 2003 - Letter from Laura Bose to Equilon giving 1999 application administrative completeness for wells EPA has determined to be Class I NH. Indicated technical review was being initiated.

Jan 2006 - Letter from David Albright to Big West requesting that 1999 application be updated. Included some specific comments.

Sept 2006 - Letter from David Albright to Big West for Administrative Completeness of the application (up to 8 new Class I NH wells included). Indicated technical review was

being initiated.

Jan 2007 - Letter from David Albright to Big West with technical review comments on August 2006 application.

Sept 2010 - George Robin meets with Alon team.

Oct 2010 - Letter from David Albright to Alon indicating a new application is required and that technical review of prior application will cease.

Jan 2011 - Alon submits new UIC application (Up to 6? new Class I wells)

March 2011 - Letter from David Albright to Alon with Administrative Completeness. Indicated technical review is being initiated.

Date Uncertain - EPA provided Alon with a draft UIC permit.

Dec 2013 - Jim Walker provided George Robin with technical review comments.

March 2014 - Letter from David Albright to Alon, RFI

June 2014 - Response to RFI provided. Review of response to RFI presented separately.

RWQCB

WDR 91-102 (the Order) issued to Texaco April 1991 for 4 existing wells and 3 proposed wells. There were a few updates to the WDR requiring additional monitoring, such as for MTBE. Most current update in our files is Jan 2001.

WDR has no expiration date.

There were some violations of the reporting requirements of the Order over time.

Page 4 of the Order states "Analysis of waters from the proposed injection zone indicates it is of poor quality with a total dissolved solids concentration of greater than 3,000 mg/l. The proposed injection zone is not an underground source of drinking water in accordance with State of California criteria contained in Region Board Resolution No 89-098. "

DoGGR

Letter from Richard Thesken to Big West made a variety of erroneous claims about the exemption status of the injection formations. (attached)

Aquifer exemption Issues

There may be one injection well injecting into a non exempt formation. I had asked for maps from Alon to try to get a handle on this but the maps are inadequate. Three of the four operating wells are most likely injecting into exempt aquifers.

For the potential future wells the information provided thus far is unhelpful at determining where they propose to inject into exempt aquifers or not.

